

**BEFORE**

**THE PUBLIC SERVICE COMMISSION OF**

**SOUTH CAROLINA**

**DOCKET NO. 2019-363-E**

<b>IN RE:</b> Inquiry Initiated by Commissioner Ervin to ) Investigate the Reported Sale of Customers' ) Personal Information to Third-Parties by ) Dominion Energy South Carolina, ) Incorporated ) <hr style="width: 40%; margin-left: 0;"/>	<b>FIRST AND CONTINUING          AUDIT REQUEST FOR          RECORDS AND          INFORMATION FROM          SOUTH CAROLINA OFFICE          OF REGULATORY STAFF</b>
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**TO: HOMESERVE USA REPAIR MANAGEMENT CORPORATION:**

The Public Service Commission of South Carolina ("Commission"), on November 25, 2019, requested that the South Carolina Office of Regulatory Staff ("ORS") investigate a reported sale of customer personal information by Dominion Energy South Carolina, Inc. ("DESC") to a third party. The marketing solicitations sent to DESC customers that prompted the investigation related to repair plans offered by HomeServe USA Repair Management Corporation ("HomeServe"). As part of its investigation, ORS requests that HomeServe provide the information and records described below to ORS at 1401 Main Street, Suite 900, Columbia, South Carolina, 29201, no later than January 29, 2019. If you are unable to respond to any of the audit requests, or part or parts thereof, please specify the reason for your inability to respond and respond to the portion for which you do have knowledge or information.

As used in these audit requests, "identify" means, when asked to identify a person, the full name, business title, address and telephone number. As used in these audit requests, "address" means mailing address and business address. When asked to identify or provide a document, "identify" and "provide" mean a full and detailed description of the document and the name and

address of the person who has custody of the document. In lieu of providing a full and detailed description of a document, a copy of the document may be attached with the identity of the person who has custody of it. When the word “document” is used herein, it means any written, printed, typed, graphic, photographic, or electronic matter of any kind or nature and includes, but is not limited to, statements, contracts, agreements, reports, opinions, graphs, books, records, letters, correspondence, notes, notebooks, minutes, diaries, memoranda, transcripts, photographs, pictures, photomicrographs, prints, negatives, motion pictures, sketches, drawings, publications, and tape recordings.

Wherever in this audit request a masculine pronoun or possessive adjective appears, it refers to both males and females in accordance with traditional English usage.

**IT IS THEREFORE REQUESTED:**

- I. All information be provided to ORS in the format requested.
- II. All responses to the requests below be labeled using the same numbers as the requests.
- III. If information requested is found in other places or other exhibits, reference shall not be made to those; instead, reproduce and place a copy of the requested information in the appropriate numerical sequence.
- IV. That any inquiries or communications relating to questions concerning clarification of the information requested below should be directed to Ryder C. Thompson [803.737.0664], Sarah Wilhite [803.737.0886], Christopher M. Huber, Esquire [803.737.5252], and Alexander W. Knowles, Esquire [803.737.0889] of ORS.
- V. This entire list of questions be reproduced and included in front of each set of responses.
- VI. Please provide HomeServe’s responses and any records produced in hard copy or in an agreed upon electronic format.
- VII. If the response to any request is that the information requested is not currently available, please state when HomeServe will be able to provide the information.

- VIII. This request is continuing such that ORS requests that HomeServe supplement or amend its responses as any additional information becomes available, until such time as the ORS report is filed with the Commission.
- IX. If the information requested is kept, maintained, or stored using spreadsheets, please provide electronic versions of the spreadsheets, including the formulas used and embedded in the spreadsheet.
- X. Provide a signed and notarized verification under oath that the records and information HomeServe produces in response to this request is true and correct.

### **DEFINITIONS:**

- 1) "Customer information" means non-public information or data specific to a DESC retail electric or gas customer or group of customers, including, but not limited to, electricity consumption, natural gas consumption, load profile, billing history, personal identifying information (name, address, census block), dates of service, telephone/e-mail address, account numbers (financial and utility), meter number or credit history, that is or has been obtained or compiled by HomeServe.
- 2) "DESC" means Dominion Energy South Carolina, Inc. and its predecessors, including South Carolina Electric & Gas, Incorporated ("SCE&G").
- 3) "Dominion" means Dominion Energy, Inc. and any Subsidiary or Affiliate of Dominion Energy, Inc., including DESC.

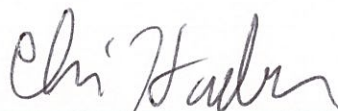
### **REQUESTS:**

- 1-1 Identify and provide a list of any and all documents, including but not limited to contracts, service, usage and/or data-sharing agreements, and partnership agreements, that explain the business arrangement between Dominion and HomeServe. Provide the following detailed information in the listing for each contract or agreement:
  - (a) The jurisdiction in which the contract or agreement is effective.
  - (b) The legal names of the entities party to the contract or agreement.
  - (c) The purpose of the relationship between Dominion and HomeServe.
  - (d) The type of customer information data-sharing including, but not limited to, zip code, customer-tailored information, usage, account information, and/or anonymized data.
  - (e) The compensation structure between Dominion and HomeServe.
  - (f) Whether the agreement is subject to state regulatory approval.
  - (g) Date and order number for state regulatory approval.
  - (h) Copy of the document.
- 1-2 Identify and provide a detailed explanation for how HomeServe has entered any arrangements or agreements with Dominion. Provide any and all procurement documents

to support the arrangements between HomeServe and Dominion that resulted in the marketing of HomeServe services to DESC customers in the calendar year ending December 31, 2019.

- 1-3 Identify and provide any and all documents that detail the compensation structure between Dominion and HomeServe, including, but not limited to, compensation for customer information, the opportunity to directly market non-regulated services to DESC customers, and billing and payment processing of HomeServe services on DESC bills.
- 1-4 Describe the third-party billing and payment agreement(s) between Dominion and HomeServe.
- 1-5 Is HomeServe an affiliate of Dominion? If yes, please specify all relationships.
- 1-6 Identify any financial interests held by Dominion or any of its officers, directors, or managers in HomeServe.
- 1-7 Please provide all insurance company ratings for HomeServe provided by South Carolina Department of Insurance, A.M. Best, Fitch, Moody's, Standard and Poor's, or any other rating agency.
- 1-8 Provide a list of monetary amounts and date(s) of disbursement from HomeServe to Dominion for any compensation relating to DESC customers from January 1, 2013 through November 30, 2019.
- 1-9 Provide a list of monetary amounts and date(s) of disbursement from Dominion to HomeServe for any compensation or remittance of payments for services relating to DESC customers from January 1, 2013 through November 30, 2019.
- 1-10 Identify and provide any and all documents, policies, and/or procedures that detail how HomeServe protects Dominion customer information and any personally identifiable information.
- 1-11 Explain how, and in what format, HomeServe was provided access to DESC customer information.
- 1-12 Provide a sample of the customer information, in functional Excel form with all formulas intact, that was shared between Dominion and HomeServe. For this request:
  - (a) Include data sent from Dominion to HomeServe, as well as any data sent from HomeServe to Dominion.
  - (b) Describe the data sets and the purpose of the data in detail.
- 1-13 Does HomeServe share/sell DESC provided customer data to other entities? If so:

- (a) Provide the name and business of the recipient as well as the purpose for the sharing of data.
  - (b) Provide the agreement between Dominion and HomeServe that allows HomeServe to share/sell DESC customer data to other parties.
  - (c) Describe how customer consent is received for the share/sale of DESC customer data.
- 1-14 Provide a copy of any and all materials relating to repair plans, services, and/or products offered by HomeServe sent to DESC customers utilizing customer information provided by DESC or Dominion. This request encompasses any and all communications sent to or targeting DESC customers via any and all communication methods, including, but not limited to, U.S. Mail, social media, text, email, telephone, envelopes mailed to customers, bill inserts, and bill messages on billing statements.



Christopher M. Huber, Esquire  
Alexander W. Knowles, Esquire  
**South Carolina Office of Regulatory Staff**  
1401 Main St., Ste. 900  
Columbia, SC 29201  
Phone: (803) 737-5252  
(803) 737-0889  
Email: [chuber@ors.sc.gov](mailto:chuber@ors.sc.gov)  
[aknowles@ors.sc.gov](mailto:aknowles@ors.sc.gov)

January 13, 2020